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Counsel for Plaintiffs and the Proposed Classes

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

J.L., C.B., K.S., P.M., N.G., R.F., J.D., and G.R.
 individually, and on behalf of all other similarly
 situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

CASE NO.: 3:23-cv-03440-AMO

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE CASE
 MANAGEMENT CONFERENCE**

Judge: Hon. Araceli Martínez-Olgún

1 Defendant Google LLC and Plaintiffs J.L., C.B., K.S., P.M., N.G., R.F., J.D., and G.R.
2 (collectively, “the Parties”), by and through their respective counsel of record, hereby stipulate as
3 follows:

4 WHEREAS, Plaintiffs filed this action on July 11, 2023 (ECF No. 1);

5 WHEREAS, Defendant filed its motion to dismiss on October 16, 2023 (ECF No. 20);

6 WHEREAS, the Court has set an initial case management conference for this case for
7 October 26, 2023 at 10 a.m., and the joint case management statement is presently due by October
8 19, 2023 (ECF No. 10);

9 WHEREAS, the Parties have met and conferred multiple times on case management issues,
10 and are continuing to do so;

11 WHEREAS, the Parties believe that, with additional time to meet and confer on case
12 management matters, they may be able to reach further agreement and streamline case
13 management issues for presentation to the Court;

14 WHEREAS, the Parties agree that good cause exists for a brief continuance of the case
15 management conference and related deadlines (namely, the deadline for filing the joint case
16 management statement and exchanging initial disclosures under Rule 26(a));

17 WHEREAS, counsel for the Parties have conflicts in November due to travel obligations
18 and the Thanksgiving holiday, but are available on November 30, 2023;

19 WHEREAS, the stipulated continuance would not affect any other date or deadline set by
20 the Court apart from the date of the case management conference and the deadline for submission
21 of the joint case management statement;

22 NOW, THEREFORE, pursuant to Civil Local Rules 6-2 and 7-12, the Parties agree, subject
23 to the approval of the Court, as follows:

- 24 1. The Initial Case Management Conference, currently scheduled for October 26, 2023 at
25 10 a.m., shall be continued to November 30, 2023 at 10 a.m.;
- 26 2. The Parties’ joint case management statement shall be filed by November 22, 2023;
27 and
- 28 3. The Parties shall make their Rule 26(a) initial disclosures by November 22, 2023.

1 Dated: October 17, 2023

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

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3 By: /s/ David H. Kramer

David H. Kramer
dkramer@wsgr.com

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5 *Counsel for Defendant*

6 Dated: October 17, 2023

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8 By: /s/ Yana Hart

Yana Hart
yhart@clarksonlawfirm.com

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10 *Counsel for Plaintiffs and the Proposed Classes*

11 **SIGNATURE ATTESTATION**

12 I, David H. Kramer, am the ECF User whose ID and password are being used to file this
13 document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence
14 in the filing of this document has been obtained from the other signatory.

15 By: /s/ David H. Kramer

David H. Kramer

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2023

HON. ARACELI MARTÍNEZ-OLGUÍN
UNITED STATES DISTRICT COURT JUDGE